

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Addendum 1 to the Groundwater Study Sampling and Analysis Plan for
Additional Groundwater Sampling South of Interstate Highway 10
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed reviews of the above referenced document dated December 29, 2011. The enclosed comments shall be incorporated in the Final Addendum 1 to the Groundwater Sampling and Analysis Plan and copies provided for review and approval within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Bob Allen (Harris County)
Nicole Hausler (Port of Houston)
Jessica White (NOAA)

miller:2/16/12:L:\Superfund\oversight\sjrwp addendum 1 – groundwater sap comments
2-15-2012

SANCHEZ
6SF-RA

**Draft Addendum 1 to the Groundwater Study Sampling and Analysis Plan (SAP)
for Additional Groundwater Sampling South of Interstate Highway 10 (I-10)
San Jacinto River Waste Pits Superfund Site**

Comments:

1. **(General):** A list of the acronyms shall be provided near the beginning of the memorandum.
2. **(Sample Collection Design, Page 6, last paragraph):** This section states "...soil samples will be visually inspected, logged, and..." The soil samples shall also be photographed for inclusion in the resulting report.
3. **(Analytical Approach, p. 7):** This section indicates that the results of the groundwater analyses will be compared with National Drinking Water Standards; however, according to Table 1, if no standards are present the next levels of comparison are EPA risk-based screening levels for tap water and then Texas Risk Reduction Program (TRRP) protective concentration levels (PCLs) for residential groundwater ingestion. This shall be explained and addressed in the text of the document.
4. **(Analytical Approach, p. 7):** The list of analytes does not include volatile or semi-volatile (except a few) organic compounds. According to the Field Sampling Report for soil, a number of the soil borings in the southern impoundment area reported the presence of "sheen" and "petroleum odors". The Southwest Shipyard facility is located immediately east of the southern impoundment and according to their 2010 Annual Progress Report, 14 volatile organic compounds (VOCs) and 20 semi-volatile organic compounds (SVOCs) were detected in the Upper Transmissive Zone ground water samples. The proposal shall be modified to include ground water analysis for VOCs (EPA Method 8260, latest version) and a broad suite of SVOCs..
5. **(Table 1):** TRRP PCLs are given as the source for the copper and manganese Analytical Concentration Goals (ACGs) (1000 ug/L and 50 ug/L, respectively). However, the correct TRRP residential groundwater ingestion numbers are 1300 ug/L and 1100 ug/L, respectively, for these chemicals. The ACGs shall be corrected. Also, the footnote for the source of the thallium ACG is given as "a"; however, it should be "b"; this shall be corrected.